

LAGOMARSINO LAW

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UNITED STATES DISTRICT COURT
CLARK COUNTY, NEVADA

TRINITA FARMER, individually,
 Plaintiff,

v.

LAS VEGAS METROPOLITAN POLICE
 DEPARTMENT, a political subdivision of the
 State of Nevada; KENNETH LOPERA,
 individually; TRAVIS CRUMRINE, individually;
 MICHAEL TRAN, individually; MICHAEL
 FLORES, individually,

Defendants.

CASE NO: 2:18-cv-00860-GMN-VCF

STIPULATION AND [PROPOSED]
ORDER TO EXTEND BRIEFING
DEADLINES TO DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGMENT
(ECF NO.'S 125 & 129)

(First Request)

WHEREAS Defendants Las Vegas Metropolitan Police Department, Travis Crumrine, Michael Flores, and Michael Tran collectively filed a Motion for Summary Judgment on December 16, 2019 (ECF No. 125). Defendant Kenneth Lopera filed his Motion for Summary Judgment on December 16, 2019 (ECF No. 129).

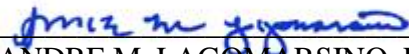
Pursuant to Local Rule IA 6-1(a), the parties hereby stipulate to extend the deadline for Plaintiff to file her Responses to Defendants' Motions for Summary Judgment. The current deadline for Plaintiff to respond to Defendants' Motions for Summary Judgment is January 6, 2020. The new deadline for Plaintiff to respond to Defendants' Motions for Summary Judgment will be January 13, 2020.

This extension is the first request and is not for the purpose of delay but rather because defendants' motions are extensive and voluminous, each brief requires a thorough and thoughtful response by plaintiff; plaintiff's counsel's availability during the holidays will be limited to devote

adequate time to crafting the responses to each of the defendants' briefs; plaintiff's counsel has pre-trial exhibit exchanges and disclosures due around the same time as the current deadline to file responses to defendants' briefs (approximately 30,000 documents have been previously exchanged between the parties); and plaintiff is co-chairing a medical malpractice trial in the Eighth Judicial District Court of Nevada that is confirmed for January 13, 2020 in the matter of *Bahram Mouzoon vs. Jon L. Seims, M.D. et al.*, case number A-15-714462-C.

DATED this 20th day of December, 2019.

LAGOMARSINO LAW


ANDRE M. LAGOMARSINO, ESQ.
3005 W. Horizon Ridge Pkwy., Suite 241
Henderson, Nevada 89052
Attorney for Plaintiff Trinita Farmer

DATED this 20th day of December, 2019.

MCNUTT LAW FIRM, P.C.

/s/ Daniel R. McNutt
Daniel R. McNutt, Esq.
625 South 8th Street
Las Vegas, Nevada 89101
Attorney for Defendant Kenneth Lopera

DATED this 20th day of December, 2019.

MARQUIS AURBACH COFFING

/s/ Craig R. Anderson
Craig R. Anderson, Esq.
10001 Park Run Drive
Las Vegas, Nevada 89145
*Attorneys for Defendants LVMPD,
Crumrine, Tran, and Flores*

IT IS SO ORDERED.

ORDER

Dated this 23 day of December,
2019.


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT